EXHIBIT I

09-50026-mg Doc 12230-9 Filed 12/03/12 Entered 12/03/12 11:49:04 Exhibit I - Proposed Order Pg 2 of 3

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re :

MOTORS LIQUIDATION COMPANY, et al., : Case No.: 09-50026 (REG)

f/k/a General Motors Corp., et al.

Debtors. : (Jointly Administered)

Chapter 11

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ORDER GRANTING MOTION OF GENERAL MOTORS LLC PURSUANT TO 11 U.S.C. §§ 105 AND 363 TO ENFORCE SALE ORDER

Upon the Motion, dated December 3, 2012 (the "Motion"), of General Motors LLC (f/k/a General Motors Company) ("New GM"), pursuant to Sections 105 and 363 of the Bankruptcy Code, seeking the entry of an order enforcing the Sale Order by (a) directing Ashraf Elgohary ("Elgohary") to cease and desist from further prosecuting, or otherwise pursuing the claims asserted by him in an action ("State Court Action") commenced in the Superior Court of New Jersey, Camden County, Case No. L 975-12, against New GM, and (b) directing Elgohary to dismiss the State Court Action with prejudice forthwith, all as more fully set forth in the Motion; and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be given; and a hearing (the "Hearing") having been held with respect to the Motion on January 17, 2013; and upon the record of the Hearing, the Court having found and determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore; it is hereby

Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

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Proposed Order

ORDERED that the Motion is GRANTED as set forth herein; and it is further

ORDERED that Elgohary shall dismiss the State Court Action, with prejudice on

or before January 22, 2013; and it is further

ORDERED that Elgohary and all persons acting in concert with him shall cease

and desist from prosecuting the claims attempted to be asserted in the State Court Action; and it

is further

ORDERED that Elgohary shall file with the Clerk of this Court evidence of the

dismissal, with prejudice, of the State Court Action within 10 business days after the entry of this

Order; and it is further

ORDERED that this Court shall retain exclusive jurisdiction to hear and

determine all matters arising from or related to this Order, including the determination of the

amount of costs and expenses (including reasonable attorneys' fees) to be awarded to New GM

at an inquest hearing to be scheduled by the Court upon the filing of a separate application by

New GM.

Dated:

New York, New York

UNITED STATES BANKRUPTCY JUDGE

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